

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DENNIS KOESTERER, Individually and on
behalf of all others similarly situated,

Plaintiff,

-v-

WASHINGTON MUTUAL, INC., et al.,

Defendants.

Case No.: 07-cv-9801
Judge Colleen McMahon

ECF CASE

JOEL ABRAMS, Individually and on behalf
of all others similarly situated,

Plaintiff,

-v-

WASHINGTON MUTUAL, INC., et al.,

Defendants.

Case No.: 07-cv-9806
Judge Alvin Hellerstein

ECF CASE

**NOTICE OF MOTION OF BURTON ROSENFELD FOR THE CONSOLIDATION OF
ALL RELATED ACTIONS, FOR APPOINTMENT AS LEAD PLAINTIFF AND FOR
APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL**

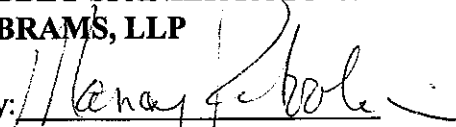
PLEASE TAKE NOTICE that, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995 ("PSLRA"), class member Burton Rosenfield, hereby moves this Court at the United States District Court for the Southern District of New York, located at 500 Pearl Street, New York, New York, at a date and time to be determined by the Court, for an Order: (i) consolidating all related cases and any subsequently filed related cases; (ii) appointing the Mr. Rosenfield as Lead Plaintiff in the consolidated action and any subsequently filed related cases; and (iii) approving his selection of Abbey Spanier Rodd & Abrams, LLP, as Lead Counsel.

This Motion is based on the accompanying Memorandum of Points and Authorities in support thereof, the Declaration of Nancy Kaboolian filed herewith, and all prior pleadings and proceedings herein, and such other written or oral argument as may be permitted by the Court.

Dated: January 4, 2008
New York, New York

Respectfully Submitted,

**ABBEY SPANIER RODD &
ABRAMS, LLP**

By: 
Nancy Kaboolian (NK 6346)
212 East 39th Street
New York, New York 10016
nkaboolian@abbeyspanier.com
Tel: (212) 889-3700
Fax: (212) 684-5191

Proposed Lead Counsel

Samuel R. Simon, Esq.
Jacobs Law Group, P.C.
1800 J.F.K. Boulevard Suite 404
Philadelphia, PA 19103
215-569-9701